

**EXHIBIT 19**

**From:** Knudson, Jacquelyn Swanner  
**Sent:** Wednesday, February 17, 2021 6:28 PM  
**To:** donald@creadorelawfirm.com; Scott R. Bickford; Kent Harrison Robbins - KHR Law Offices; apreis@akingump.com  
**Cc:** McClammy, James I.; Oluwole, Chautney M.; Townes, Esther C.; 'Hoff, Robert'; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com  
**Subject:** Purdue - NAS Committee Meet and Confer

Don, All—

Following up on our meet and confer yesterday, as Rob explained, there has not been a “Central Repository Stamford” database in use or even identified in at least the last 20 years. It simply does not exist. The cite to the “Central Repository Stamford, CT: Vol. 105, VIII” in the document you provided us refers to a particular document that is cited in the OxyContin NDA and other regulatory materials. Though this nomenclature was subsequently repeated when referencing this single document, our research does not identify any evidence that there was or is a “Central Repository Stamford,” and searches we conducted have not uncovered a reference to any document other than the one cited as Vol. 105, VIII.

As noted in my prior email, the document referred to as “Central Repository Stamford, CT: Vol. 105, VIII” has been produced a number of times from different sources of discovery and collections (e.g., custodian, non-custodian, NDA, drives). For ease of reference, we have copied a sample of the bates numbers where you can find this document:

PPLPC002000179852  
PPLPC005000119793  
PPLPC016000222709  
PPLPC018000202388  
PPLPC019000242243  
PPLPC020000231378  
PPLPC051000072471  
PPLPC056000063938  
PURCHI-000572404  
PDD1701067475  
PKY183283157  
PPLP004497156

As we stated on the call, and as discussed previously, to the extent you are looking for specific studies related to an opioid product, we have conducted multiple diligent searches and are not aware of anything outside of what has already been searched for and produced. To the extent those studies were part of materials produced to the FDA, we have cited you to where those studies appear in the productions to which you have access. Furthermore, with all of the searches conducted (both of custodial and central/system files), we believe that, to the extent studies exist, pre-clinical toxicology studies on relevant opioid products in Purdue’s possession were likely collected, reviewed, and produced as part of the various productions you already have. If there are specific studies or categories of studies you believe you do not have or would like us to search for, we are available to discuss (reserving all rights, including with respect to burden and whether such studies are the proper subject of discovery). But we request you first search the tens of millions of documents Purdue has previously produced to determine if the studies could be found. Otherwise, a vague suggestion that you just want to know about all studies relating in any way to OxyContin is not a helpful starting point.

Regarding your request for birth mother prescription information, as discussed on yesterday's call, we will run searches for any names of birth mothers for whom you provide us HIPAA releases. We would like to assist you with your request if at all feasible, but this is a time-intensive process that diverts Purdue resources from other important tasks. As noted, our test run of certain names through the AE database resulted in zero matches. And, there is no question that any match concerns HIPAA protected health information on the birth mothers (who you do not represent). Accordingly, before we undertake the effort and expense of this exercise, we want to be sure that any information we find can actually be disclosed. You agreed that you will work to get us the HIPAA releases for your group (as well as for any members of the WV NAS group that you would like to include in the search) so that we can proceed with the searches.

Best,

**Jacquelyn Swanner Knudson**

**Davis Polk & Wardwell LLP**

450 Lexington Avenue | New York, NY 10017  
+1 212 450 3341 tel | +1 803 417 3273 mobile  
[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)

---

Confidentiality Note: This email is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. Unauthorized use, dissemination, distribution or copying of this email or the information herein or taking any action in reliance on the contents of this email or the information herein, by anyone other than the intended recipient, or an employee or agent responsible for delivering the message to the intended recipient, is strictly prohibited. If you have received this email in error, please notify the sender immediately and destroy the original message, any attachments thereto and all copies. Please refer to the firm's [Privacy Notice](#) for important information on how we process personal data. Our website is at [www.davispolk.com](http://www.davispolk.com).

J.I.M. & Jacquelyn